

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
AUTOHAUS ACQUISITION, INC., : CASE NO. 1:09-bk-07158
d/b/a VICTORY VOLKSWAGEN, :
Debtor : CHAPTER 7

OBJECTION OF TRUSTEE IN BANKRUPTCY TO
CLAIM NO. 4 OF IFEX GLOBAL, INC.

TO THE HONORABLE ROBERT N. OPEL, II, BANKRUPTCY JUDGE:

COMES NOW, Lawrence G. Frank, Trustee in Bankruptcy in the above-captioned proceeding, and objects to Claim No. 4 of IFEX Global, Inc., respectfully stating in support thereof:

1. Claimant, IFEX Global, Inc., filed Claim No. 4 in the above-captioned proceeding on October 29, 2009 in the amount of \$1,238,180.00.

2. Attached to the Proof of Claim is a list of 14 vehicles allegedly "stolen" by the Debtor with certificates of origin attached.

3. The Trustee has reviewed all documents compromising the Proof of Claim and attachments and disputes the secured status of the claimant.

4. Also, there is no indication of any nature that the funds turned over to the Trustee in Bankruptcy and presently in the Trustee's checking account constitute

proceeds from the sale of the vehicles in dispute and which are the subject of the instant claim.

5. Also, Susquehanna Bank has filed a claim as a secured creditor in the case, which is disputed by the Trustee, claiming the majority of the proceeds being held by the Trustee as a secured creditor.

6. The claim of the claimant, if any, is that of a general unsecured creditor, but the Trustee believes and therefore avers that the claimant has no claim of any nature in the instant case and is not entitled to share in the proceeds currently being held.

WHEREFORE, the Trustee respectfully requests this Honorable Court to issue an Order striking the claim of the claimant and entitling it to no distribution of any nature in this case.

RESPECTFULLY SUBMITTED BY:

/s/Lawrence G. Frank
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TRUSTEE IN BANKRUPTCY

CERTIFICATE OF SERVICE

AND NOW, this 15th day of March, 2011, I, Lawrence G. Frank, Esquire, hereby certify that I this day electronically filed the foregoing document with the Clerk of the Bankruptcy Court using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail address:

Office of the U.S. Trustee - ustpreregion03.ha.ecf@usdog.gov

I hereby certify that I have this day served a copy of the foregoing document(s) by depositing same in the United States mail, postage prepaid, addressed to the attorneys or parties of record as follows:

George Bochetto, Esquire
Bochetto & Lentz, P.C.
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Philadelphia, PA 19102

/s/Lawrence G. Frank
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Trustee In Bankruptcy